

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO

KEYBANK NATIONAL ASSOC., )  
                                )  
                                )  
Plaintiff,                 )  
                                )  
                                )  
v.                             ) Civil Action No. 14-cv-1368-DCN  
                                )  
                                )  
JASON COPE, et al,         )  
                                )  
                                )  
Defendants.                 )

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**ANSWER**

The United States Securities and Exchange Commission (“SEC”), by and through its attorney Michael J. Roessner, Assistant Chief Litigation Counsel, hereby submits its Answer to Plaintiff’s Complaint as follows:

1.       Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 1.
2.       Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 2.
3.       Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 3.
4.       Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 4.
5.       Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 5.

6. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 6.

7. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 7.

8. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 8.

9. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 9.

10. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 10.

11. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 11.

12. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 12.

13. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 13.

14. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 14.

15. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 15.

16. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 16.

17. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 17.

18. Defendant SEC lacks information sufficient to form a belief as to the truth of the allegations set forth in paragraph 18.

**WHEREFORE**, the United States Securities and Exchange Commission respectfully requests that this Court:

1. Determine and adjudge that the United States Securities and Exchange Commission's Abstract of Judgment, recorded as Instrument No. 201205219002, and its Judgment Lien filed in Civil Case No. JL-12-479456, both recorded on May 21, 2012, in the Records of Cuyahoga County, State of Ohio, created valid and subsisting judgment liens on all property and rights to property belonging to Jason Cope including on the subject property located at 7449 Brigham Road Gates Mills, OH 44040;

2. Order that all valid liens upon the subject property be enforced, and that the Court order the foreclosure and sale of the subject property, and distribute the proceeds of the sale to such parties and in such amounts as the Court determines; and

3. Award the United States Securities and Exchange Commission its further costs and such other and further relief as the Court deems just and proper.

Dated: June 25, 2014

Respectfully submitted,

s/MICHAEL J. ROESSNER  
MICHAEL J. ROESSNER  
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Division of Enforcement  
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## **CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that on June 25, 2014, a copy of the foregoing Answer was mailed by regular U.S. mail, postage prepaid to the following defendants at the following addresses:

CITIMORTAGE, Inc.  
1000 Technology Place  
O'Fallon, MO 63368

Woods Cove II, LLC  
1801 West Olympic Blvd.  
Pasadena, CA 91199

Payne and Payne Custom Builders  
10750 Mayfield Road  
Chardon, Ohio 44024

State of Ohio Department of Taxation  
c/o Ohio Attorney General Mike DeWine  
30 E. Broad Street, 14<sup>th</sup> Floor  
Columbus, Ohio 43215

United States of America  
Internal Revenue Service  
c/o United States Department of Justice  
950 Pennsylvania Avenue  
Washington, DC 20530-0001

**STEVEN M. DETTELBACH**  
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s/MICHAEL J. ROESSNER  
Michael J. Roessner